

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

ASB BANK CORP.,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 11-02730 (CGM)

**STIPULATION AND ORDER  
TO EXTEND INITIAL DISCLOSURE DEADLINE**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC, under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–*lll*, and the estate of Bernard L. Madoff, under Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 701-784, and defendant ASB Bank Corp. (“Defendant,” and together with the Trustee, the “Parties”), by and through their respective undersigned counsel, stipulate and agree as follows:

**WHEREAS**, on June 5, 2023, the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) entered a Case Management Plan in this action, which required that the Parties serve initial disclosures on or before August 4, 2023 (the “Initial Disclosure Deadline”) (ECF No. 133); and

**WHEREAS**, on July 25, 2023, the Parties executed a stipulation that extended the Initial Disclosure Deadline to August 25, 2023, and the stipulation was so ordered by the Bankruptcy Court on July 26, 2023 (ECF No. 134); and

**WHEREAS**, on August 17, 2023, the Parties executed a stipulation that further extended the Initial Disclosure Deadline to October 11, 2023, and the stipulation was so ordered by the Bankruptcy Court on August 18, 2023 (ECF No. 135); and

**WHEREAS**, on September 24, 2023, the Parties executed a stipulation that further extended the Initial Disclosure Deadline to October 31, 2023, and the stipulation was so ordered by the Bankruptcy Court on September 27, 2023 (ECF No. 136); and

**WHEREAS**, the Parties have conferred and agreed to further extend the Initial Disclosure Deadline.

**IT IS HEREBY STIPULATED AND AGREED**, by the Parties, and **SO ORDERED**, by the Court:

1. The Initial Disclosure Deadline shall be extended to January 31, 2024.
2. The Parties otherwise reserve all rights, arguments, objections, and defenses they may have, and their entry into this stipulation shall not impair or otherwise affect any such rights, arguments, objections, and defenses.

Dated: October 26, 2023  
New York, New York

**BAKER & HOSTETLER LLP**

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*Attorneys for Plaintiff Irving H. Picard,  
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SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter 7  
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*Attorneys for Defendant ASB Bank Corp.*

*/s/ Cecelia G. Morris*

**Dated: October 30, 2023**  
**Poughkeepsie, New York**



**Hon. Cecelia G. Morris**  
**U.S. Bankruptcy Judge**